



COMMONWEALTH of VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY

PIEDMONT REGIONAL OFFICE

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Molly Joseph Ward
Secretary of Natural Resources

David K. Paylor
Director

Michael P. Murphy
Regional Director

July 29, 2016

Mr. Samuel Bowen
Director, Primary & Park 500
Philip Morris USA Inc. – Manufacturing Center Complex
P.O. Box 26603
Richmond, VA 23261

Location: Richmond City
Registration No: 50076
AFS ID No: 51-760-0308

Dear Mr. Bowen:

Attached is a Title V permit to operate your tobacco processing facility pursuant to 9 VAC 5 Chapter 80 of the Virginia Regulations for the Control and Abatement of Air Pollution. This permit is a modification of the renewal of your Federal Operating Permit issued on June 18, 2014.

The permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and civil penalty. Please read all permit conditions carefully.

This approval to operate does not relieve Philip Morris USA Inc. of the responsibility to comply with all other local, state, and federal permit regulations.

Issuance of this permit is a case decision. The Regulations, at 9 VAC 5-170-200, provide that you may request a formal hearing from this case decision by filing a petition with the Board within 30 days after this permit is mailed or delivered to you. Please consult that and other relevant provisions for additional requirements for such requests.

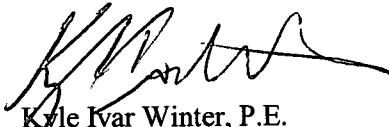
Additionally, as provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal to court by filing a Notice of Appeal with:

David K. Paylor, Director
Department of Environmental Quality
P.O. Box 1105
Richmond, Virginia 23218-1105

In the event that you receive this permit by mail, three days are added to the period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for additional information including filing dates and the required content of the Notice of Appeal.

If you have any questions concerning this permit, please call Alison Sinclair at (804) 527-5155.

Sincerely,



Kyle Ivar Winter, P.E.
Deputy Regional Director

KIW/AMS/PRO50076TVmod2016.docx

Attachment: Permit

The following federal regulations can be found at:

40 CFR, Part 60, NSPS Subparts Dc, IIII, and JJJJ

40 CFR, Part 63, MACT Subparts ZZZZ, DDDDD, and JJJJJ

cc: Chief, Air Enforcement Branch (3AP13), U.S. EPA, Region III
Director OAPP (electronic file submission)
Manager, Data Analysis (electronic file submission)
Inspector, Air Compliance



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Federal Operating Permit
Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name: Philip Morris USA Inc.
Facility Name: Philip Morris USA Inc. – Manufacturing Center Complex
Facility Location: 3601 Commerce Road
Richmond, Virginia
Registration Number: 50076
Permit Number: PRO50076

This permit includes the following programs: Federally Enforceable Requirements - Clean Air Act (Pages 1 through 45); State Only Enforceable Requirements (Page 45)

July 1, 2014
Effective Date

June 30, 2019
Expiration Date



Kyle War Winter, P.E., Deputy Regional Director

28 July 2016
Signature Date

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Permit Conditions, 45 pages

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Facility Information

Permittee

Philip Morris USA Inc.
P.O. Box 26603
Richmond, Virginia 23261

Responsible Official

Mr. Samuel Bowen
Director, Primary & Park 500

Facility

Philip Morris USA Inc. – Manufacturing Center Complex
3601 Commerce Road
Richmond, Virginia 23234-2201

Contact Person

Mr. Maurice Chemweno
Environmental Engineer
Altria Client Services
(804) 335-2943

State-County-Plant Identification Number: 51-760-0308

Facility Description: NAICS: 312230- Tobacco is processed and flavored and cigarettes are manufactured at the Philip Morris USA Incorporated (PMUSA Inc.) Manufacturing Center Complex in Richmond, Virginia. At the Manufacturing Center facility, the Bright, Burley, Oriental and Sheet tobacco are unpacked from containers and conditioned to obtain optimum moisture levels and separate clumps. The steam plant boilers supply steam for this process. A portion of the tobacco is diverted and undergoes an expansion treatment. Flavoring is added and the tobacco is cut into strips and dried. The Expanded tobacco and Scrap tobacco is added, flavoring is applied to the final tobacco blend and it is sent to storage. Cigarette filters are made and are sent to the cigarette-making machines. The blended tobacco is sent from storage to the machines. The cigarettes are then made and packaged.

The Semiworks, which is part of the Manufacturing Center Complex located just south of Bells Road adjacent to the Manufacturing Center, is a research and development facility. A portion of the equipment at the Semiworks is utilized for a commercial tobacco process.

Emission Units

Equipment to be operated consists of:

Equipment to be operated consists of:								
Emission Unit ID	Stack ID	Emission Unit Description - Manufacturer - Date of Construction		Size / Rated Capacity*	Pollution Control Device Description (PCD)**	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment – Site wide support boilers								
BO0101	AE-01B	Central Plant Package Boiler No. 1 (natural gas and #2 fuel oil) - Combustion Engineering - Pre 1974		143.5 mmBtu/hr (MCR***)	Multicyclone (80% efficient)	SD0101	PM	2/14/2014
BO0201	AE-02B	Central Plant Package Boiler No. 2 (natural gas and #2 fuel oil) -Combustion Engineering - Pre 1974		143.5 mmBtu/hr (MCR***)	Multicyclone (80% efficient)	SD0201	PM	2/14/2014
BO0302	AE-B3B	Central Package Boiler No. 3 (natural gas) – 2014		72.3 mmBtu/hr	None	None	None	2/14/2014
*** MCR = Maximum Continuous Rating. This is defined as the maximum long-term steady state firing rate.								
Fuel Burning Equipment Thermal Expansion System Burners								
FU0301	AE-41	Expanded Tobacco Process	Thermal Expansion System – 1996 (natural gas burners replaced in 2008)	6.7 mmBtu/hr	None	None	None	4/8/2016
FU0401	AE-32		Thermal Expansion System – 1996 (natural gas burners replaced in 2008)	6.7 mmBtu/hr	None	None	None	4/8/2016
Fuel Burning Equipment - Emergency Generators and Pumps								
PU0101C PU0102C		Diesel Emergency Fire Pumps – 1973		255hp each	None	None	None	None
EG0101		LPG Emergency Generator (DM Warehouse) – prior to 1995		60 kW	None	None	None	None
EG0301		LPG Emergency Generator (Security Gate K)-2002		15 kW	None	None	None	None
EG0401		LPG Emergency Generator (Security Gates C& D) - 2002		30 kW	None	None	None	None
EG0501		LPG Emergency Generator (Security Gate M) - 2002		15 kW	None	None	None	None
EG0701		LPG Emergency Generator (ASRS) - 2004		45 kW (75 hp)	None	None	None	None
EG0801		LPG Emergency Generator - 2006		15 kW	None	None	None	None
EG0102C		Diesel Emergency Generator - 2007		750 kW (1141 hp)	None	None	None	None
EG1001		Diesel Emergency Generator – 2012		500 kW (762 hp)	None	None	None	None
EG1101		Diesel Emergency Generator (Bay 10/SB Warehouse)- 2015		300 kW (480 hp)	None	None	None	None

Emission Unit ID	Stack ID	Emission Unit Description - Manufacturer - Date of Construction	Size / Rated Capacity*	Pollution Control Device Description (PCD)**	PCD ID	Pollutant Controlled	Applicable Permit Date
Tobacco Processing							
CS0101	AE-45	Conditioning Process – Leaf and Sheet (conditioning cylinders) – 1995, 2008	50,000 lb/hr Leaf 41,000 lb/hr Sheet	Four rotoclone scrubbers (90.0% efficient)	SR0101	PM	4/8/2016
CS0201	AE-46				SR0201		
CS0301	AE-47				SR0301		
CS1001	AE-R1				SR2801		
SP1301, SP1401, SP1501, SP1601	AE-E7a AE-E8a AE-E9a	Separating Process –Leaf and Sheet (pneumatic separators) - 2008	50,000 lb/hr Leaf 41,000 lb/hr Sheet	Three Baghouse filters (99.5% efficient)	BH4101 BH4102 BH4103	PM	4/8/2016
CS0901/ (CS0902)	AE-H8	Expanded Tobacco Process	Liquid application and conditioning cylinder – 1996 (2016)	Rotoclone scrubber (90.0% efficient)	SR2601 (SR2602)	PM	4/8/2016
CO0101	AE-34		Conveyor – 1983	Wet scrubber (90.0% efficient for particulate; 40.0% efficient for VOC)	SC0101	PM VOC	4/8/2016
CO0601	AE-35		Conveyor - 2009	Wet scrubber (90.0% efficient for particulate; 40.0% efficient for VOC)	SC0201	PM VOC	4/8/2016
CO0301	AE-E4		Conditioning chamber and conveyor – 1996	Wet scrubber (90.0% efficient for particulate; 40.0% efficient for VOC)	SC0301	PM VOC	4/8/2016
CO0401							
OC0401							
PP0101 (OC0301, OC0401)	AE-G8		Mechanical Transport system – 1997	14,000 lbs/hr	Baghouse filter (99.5% efficient)	BH5601	PM
SM0402	AE-H5	Mechanical separator - 1996	7,000 lbs/hr	Baghouse filter (99.5% efficient)	BH5701	PM	4/8/2016
SM0502	AE-H6	Mechanical separator - 1996	7,000 lbs/hr	Baghouse filter (99.5% efficient)	BH5801	PM	4/8/2016
FU0301	AE-41	Thermal Expansion System – 1996	7,000 lbs/hr	None	None	None	4/8/2016
EX0101		Thermal Expansion System – 1996	7,000 lbs/hr	None	None	None	4/8/2016
FU0401		Thermal Expansion System – 1996	7,000 lbs/hr	None	None	None	4/8/2016
EX0201	AE-32						
TP3301	AE-R2 AE-R3	Scrap Tobacco Process	Exempt Pneumatic Transport System - 2008	Two baghouse filters (95.0% efficient)	BH8601 BH8602	PM	4/8/2016
CS0601	AE-70	Cutting and Drying Process	Conditioning cylinders - 1974	Two rotoclone scrubbers (90.0% efficient)	SR2701	PM	4/8/2016
CS0701					SR1401		

Emission Unit ID	Stack ID	Emission Unit Description - Manufacturer - Date of Construction		Size / Rated Capacity*	Pollution Control Device Description (PCD)**	PCD ID	Pollutant Controlled	Applicable Permit Date
DR0601	AE-Q1	Cutting and Drying Process	Steam dryers – 2008	68,000 lbs/hr	Four rotoclone scrubbers (90.0% efficient) followed by a thermal oxidizer (95.0% efficient for VOC)	SR2901	PM	4/8/2016
DR0701						SR3001		
DR0801						SR3101		
DR0901						SR3201		
TR0101	AE-42 AE-30	Dry Flavor Preparation Process	Flavor Tanks	2,508 gal/hr	None	None	None	4/8/2016
TR0102								
TR0103								
MT0101								
MT0102	AE-89		Mechanical transport system (flavor components)- 2015	6,000 lb/hr	Cartridge filter (99.0% efficient)	BH3102	PM	4/8/2016
DC0102								
FC0101								
FC0201								
FC0301	AE-17 AE-26 AE-18	Liquid application cylinders – 2014, 2015, 2016		60,000 lbs/hr	Four rotoclone scrubbers (90.0% efficient)	SR0901	PM	4/8/2016
FC0401								
DA0101								
DA0201								
DA0301	AE-25 AE-22 AE-19 AE-15	Steam dryers - 1992		60,000 lbs/hr	None	None	None	4/8/2016
DA0401								
CC0101								
CC0301								
CC0201	AE-42	Liquid application cylinders - 1974	Liquid application cylinders - 1974	30,000 lbs/hr	Two rotoclone scrubbers (90.0% efficient)	SR1001	PM	4/8/2016
CC0401								
FC0501								
FC0502								
FC0601	AE-Q1	Liquid application cylinders - 1993, 1995		100,000 lbs/hr and 175 tpy ethanol	Four rotoclone scrubbers (90.0% efficient for particulate) followed by a thermal oxidizer (95.0% efficient for VOC)	SR1901	PM	10/14/97 RACT & 4/8/2016
FC0602								
FC0701								
FC0702								
FC0801						IN0401	VOC	
FC0802								
-	Fugitive	Application of Ethanol based flavors		175 tons/yr ethanol	None	None	None	None

Emission Unit ID	Stack ID	Emission Unit Description - Manufacturer - Date of Construction	Size / Rated Capacity*	Pollution Control Device Description (PCD)**	PCD ID	Pollutant Controlled	Applicable Permit Date
TP0201	AE-L1	Pneumatic transport system – 1974, 1997	72,000 lbs/hr	Sixteen baghouse filters (99.5% efficient)	BH2001	PM	4/8/2016
	AE-L2				BH2002		
	AE-L3				BH2003		
	AE-L4				BH2101		
	AE-L5				BH2102		
	AE-L6				BH2103		
	AE-L7				BH2201		
TP1101	AE-L8	Dust and stem removal system- 1974, 1997	2,160 lb/hr	Eighteen baghouse filters (99.5% efficient)	BH2202	PM	4/8/2016
	AE-L9				BH2301		
	AE-M1				BH2302		
	AE-M2				BH2602		
	AE-M3				BH2603		
	AE-M4				BH2604		
	AE-J6				BH6101		
TP1401 TP0801 TP1501	AE-J7	Pneumatic Transport System (filters) - 1996	4,160 lb/hr	One four-segment baghouse filter (99.0% efficient) and two baghouse filters (99.0% efficient)	BH6701	PM	4/8/2016
	AE-57				BH6801		
	AE-59				BH7001		
	AE-63				BH7101		
	AE-J3				BH1701		
	AE-J4				(BH1702)		
	AE-R4				BH3201		
TP1401 TP0801 TP1501	AE-57	Pneumatic Transport System (filters) - 1996	4,160 lb/hr	One four-segment baghouse filter (99.0% efficient) and two baghouse filters (99.0% efficient)	BH3202	PM	4/8/2016
	AE-59				BH3203		
	AE-63				BH3203		
	AE-J3				BH0801		
	AE-J4				BH0802		
	AE-R4				BH0803		
	AE-J1				BH0902		
TP1401 TP0801 TP1501	AE-91	Pneumatic Transport System (filters) - 1996	4,160 lb/hr	One four-segment baghouse filter (99.0% efficient) and two baghouse filters (99.0% efficient)	BH6201	PM	4/8/2016
	AE-92				BH6301		
	AE-J1				BH6401		
	AE-91				BH6701		
	AE-92				BH8702		
	AE-J1				BH8703		
	AE-J1				BH8704		
TP1401 TP0801 TP1501	AE-91	Pneumatic Transport System (filters) - 1996	4,160 lb/hr	One four-segment baghouse filter (99.0% efficient) and two baghouse filters (99.0% efficient)	BH8801	PM	4/8/2016
	AE-92				BH3401		
	AE-J1				BH3402		
	AE-91				BH3403		
	AE-92				BH3404		
	AE-J1				BH3501		
	AE-J1				BH6001		

Emission Unit ID	Stack ID	Emission Unit Description - Manufacturer - Date of Construction	Size / Rated Capacity*	Pollution Control Device Description (PCD)**	PCD ID	Pollutant Controlled	Applicable Permit Date
VS0101	Plenum AE-63	Mechanical separating system - 1990	10,000 lb/hr	Baghouse filter (99.5% efficient)	BH0701	PM	4/8/2016
TP3001	AE-P6	Pneumatic Transport System - 2004	31.4 TPA units/hr	Baghouse filter (99.5% efficient)	BH6901	PM	4/8/2016
DC1001	AE-P7	Mechanical Transport System -2005	188.4 TPA units/hr	Baghouse filter (99.5% efficient)	BH8001	PM	4/8/2016
CN0601	AE-H7	Housekeeping vacuum system 1996	720 lbs/hr	Three baghouse filters (99.0% efficient)	BH5901 BH3801 BH3802	PM	4/8/2016
CN0602	AE-E3			Baghouse filter (99.0% efficient)	BH4201	PM	4/8/2016
CN0701	AE-F4	Housekeeping vacuum system - 1999	200 lbs/hr	Seven baghouse filters (99.0% efficient)	BH8101 BH8201 BH8301 BH8401 BH8501 BH6501 BH6601	PM	4/8/2016
MAHVSU	AE-P1 AE-P2 AE-P3 AE-P4 AE-P5 AE-P8 AE-P9	Housekeeping vacuum system – 1997, 2003	32,000 lbs/hr	Baghouse filter (99.0% efficient)	BH7301	PM	4/8/2016
CN1001	AE-J8	Housekeeping vacuum system - 2003	100 lbs/hr				
Commercial Production at Semiworks							
SP0101SW	AE-02SW	Commercial Production at Semiworks (2011)	Total Tobacco Throughput	Baghouse filter (99.0% efficient)	BH0101SW	PM/PM ₁₀	1/27/2011
OD0101SW				None	None	None	1/27/2011
PC0101SW				Scrubber (95.0% efficient)	SC0101SW	PM/PM ₁₀	1/27/2011
CS0201SW FC0101SW DA0101SW CC0101SW CC0201SW CS0301SW DR0101SW FC0201SW FC0202SW	AE-03SW			79.65 SWC units/hr			
TP0101SW	AS-05SW (indoors)	Burley Processing Equipment		Baghouse filter (99.0% efficient)	BH0301SW	PM/PM ₁₀	1/27/2011

Emission Unit ID	Stack ID	Emission Unit Description - Manufacturer - Date of Construction		Size / Rated Capacity*	Pollution Control Device Description (PCID)**	PCID IID	Pollutant Controlled	Applicable Permit Date
TP0201SW	AS-02SW (indoors)				Eight Portable Dust filters (99.0% efficient)	BH0401SW BH0402SW BH0403SW BH0404SW BH0405SW BH0406SW BH0407SW BH0408SW	PM/PM ₁₀	1/27/2011
	fugitive	Ethanol Application		10.38 lb/hr	None	None	None	1/27/2011

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.
**The PCID efficiency is provided for informational purposes only, and is not an applicable requirement.

**Fuel Burning Equipment Requirements – Site wide support boilers
Package Boilers (BO0101, BO0201, and BO0302)**

1. **Fuel Burning Equipment Requirements – Boilers - Emission Controls –** Emissions of Nitrogen Oxides (NOx) from the No. 1, No.2 and No. 3 Package Boilers (BO0101, BO0201, BO0302) shall be controlled by proper operation and maintenance. The boilers shall be provided with adequate access for inspection. (9 VAC 5-80-110 and Condition 2 of the 2/14/2014 permit)
2. **Fuel Burning Equipment Requirements – Boilers - Fuel -** The approved fuels for the No. 1 and No. 2 Package Boilers (BO0101 and BO0201) are distillate oil and natural gas. A change in the fuel may require a permit to modify and operate. (9 VAC 5-80-110 and Condition 3 of the 2/14/2014 permit)
3. **Fuel Burning Equipment Requirements – Boilers - Fuel -** The approved fuel for the No. 3 Package Boiler (BO0302) is natural gas. A change in the fuel may require a permit to modify and operate. (9 VAC 5-80-110 and Condition 4 of the 2/14/2014 permit)
4. **Fuel Burning Equipment Requirements – Boilers -Fuel Throughput -** The Package Boilers (BO0101, BO0201, and BO0302) combined shall consume no more than 1,216 million cubic feet of natural gas or 8,986,000 gallons of No. 2 distillate oil (BO0101, BO0201 only) per year, calculated monthly as the sum of each consecutive 12-month period. If a combination of the two fuels is used, then the quantities of natural gas and No. 2 distillate oil, calculated monthly as the sum of each consecutive 12 month period, shall not exceed values that will allow the following equation to hold true:

$$(X) \times (1,020 \text{ BTU/scf}) + (Y) \times (138,000 \text{ BTU/gal}) \leq 1.24 \times 10^{12} \text{ BTU/yr}$$

Where X= number of cubic feet of natural gas burned during any 12-month period
Y= number of gallons of #2 distillate oil burned during any 12-month period

Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9 VAC 5-80-110 and Condition 5 of the 2/14/2014 permit)

5. **Fuel Burning Equipment Requirements – Boilers -Fuel -** The distillate oil combusted in Package Boilers No.1 and No. 2 (BO0101 and BO0201) shall meet the specifications below:

EXISTING FUEL IN THE FUEL OIL TANK supplying the Package Boilers (BO0101 and BO0201) which meets the ASTM D396 specification for numbers 1 or 2 fuel oil:

Maximum sulfur content of 0.25%.
(9 VAC 5-80-110 and Condition 6 of the 2/14/2014 permit)

6. **Fuel Burning Equipment Requirements – Boilers - Fuel** - The distillate oil received after February 14, 2014 for Package Boilers No.1 and No. 2 (BO0101 and BO0201) shall meet the specifications below:

LOW SULFUR DISTILLATE OIL which meets the ASTM D396 specification for numbers 1 or 2 fuel oil:

Maximum sulfur content per shipment: 0.05%
(9 VAC 5-80-110 and Condition 7 of the 2/14/2014 permit)

7. **Fuel Burning Equipment Requirements – Boilers -Emission Limits** - Hourly emissions from the operation of the Package Boilers (BO0101, BO0201, and BO0302) shall not exceed the limits specified below:

<u>Hourly Emissions (lb/hr)</u>	<u>BO0101</u>	<u>BO0201</u>	<u>BO0302</u>	<u>Basis</u>
Particulate Matter (PM) (filterable)	2.1	2.1	0.2	9 VAC 5-80-1180
PM ₁₀ (including condensable)	2.4	2.4	0.6	9 VAC 5-80-1180
PM _{2.5} (including condensable)	1.7	1.7	0.6	9 VAC 5-80-1180
Sulfur Dioxide	37.0	37.0	0.1	9 VAC 5-80-1180
Nitrogen Oxides (as NO ₂)	39.4	39.4	2.6	9 VAC 5-50-260
Carbon Monoxide	11.9	11.9	4.4	9 VAC 5-80-1180
Volatile Organic Compounds	0.8	0.8	0.4	9 VAC 5-80-1180

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits.

(9 VAC 5-80-110 and Condition 10 of the 2/14/2014 permit)

8. **Fuel Burning Equipment Requirements – Boilers -Process Emission Limits** – Combined annual emissions from the operation of the Package Boilers (BO0101, BO0201, and BO0302) shall not exceed the limits specified below:

		<u>Basis</u>
Particulate Matter (PM) (filterable)	9.0 tons/yr	(9 VAC 5-80-1180)
PM ₁₀ (including condensable)	10.4 tons/yr	(9 VAC 5-80-1180)
PM _{2.5} (including condensable)	7.0 tons/yr	(9 VAC 5-80-1180)
Sulfur Dioxide	159.5 tons/yr	(9 VAC 5-80-1180)

Nitrogen Oxides (as NO ₂)	170.2 tons/yr	(9 VAC 5-50-260)
Carbon Monoxide	51.1 tons/yr	(9 VAC 5-80-1180)
Volatile Organic Compounds	3.4 tons/yr	(9 VAC 5-80-1180)

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Conditions 4, 5 and 6.
(9 VAC 5-80-110 and Condition 11 of the 2/14/2014 permit)

9. **Fuel Burning Equipment Requirements – Boilers - Visible Emissions** - Visible emissions from the No. 1 and No. 2 Package Boilers (BO0101, BO0201) shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-40-80, 9 VAC 5-80-110 and Condition 13 of the 2/14/2014 permit)
10. **Fuel Burning Equipment Requirements – Visible Emissions** - Visible emissions from the No. 3 Package Boiler (BO0302) shall not exceed 10 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-80-110 and Condition 12 of the 2/14/2014 permit)
11. **Fuel Burning Equipment Requirements – Boilers - Monitoring** - Compliance with the sulfur dioxide emission limitations in Condition 7 for BO0101 and BO0201 shall be demonstrated by maintaining records of the initial sulfur content of the fuel oil in the fuel oil storage tank (Condition 5) and by fuel supplier certifications, showing compliance with Condition 6.
(9 VAC 5-80-110)
12. **Fuel Burning Equipment Requirements – Boilers - Monitoring** - Compliance with the sulfur dioxide emission limitation in Condition 7 for BO0302 shall be demonstrated by burning natural gas in accordance with Condition 3.
(9 VAC 5-80-110)
13. **Fuel Burning Equipment Requirements – Boilers - Monitoring - Visible** emissions checks shall be conducted for the Package Boilers (BO0101, BO0201) at least monthly during periods of normal operation for a sufficient time interval to determine if there are any above-normal visible emissions. The permittee shall maintain a log noting: 1) all boiler emission points from which visible emissions occurred, and 2) whether the visible emissions were normal for the boilers. If above-normal visible emissions are observed, a visible emissions evaluation (VEE) in accordance with 40 CFR Part 60, Appendix A, Method 9 shall be conducted. The

VEE shall be conducted for a minimum period of six minutes. If any of the observations exceed the applicable opacity limit, the observation period shall continue until a total of sixty minutes of observation has been completed. A Method 9 evaluation shall not be required if the visible emissions condition is corrected in a timely manner such that no above normal visible emissions are present; the emissions unit is operating at normal operating conditions; and the cause and corrective measures taken are recorded.
(9 VAC 5-80-110)

14. **Fuel Burning Equipment Requirements – Boilers - Recordkeeping** - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Piedmont Regional Office. These records shall include, but are not limited to:
 - a. Monthly and annual consumption of each fuel for the Nos. 1, 2 and 3 Package Boilers (BO0101, BO0201, BO0302), and corresponding Btu value calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months. (Condition 15a of the 2/14/2014 permit)
 - b. All fuel supplier certifications for BO0101, and BO0201 as well as the sampling results of the initial sulfur content of the fuel oil tank supplying BO0101 and BO0201 (Condition 15b&c of the 2/14/2014 permit).
 - c. Results of visible emissions checks as required by Condition 13.
 - d. Scheduled and unscheduled maintenance on the boilers (BO0101, BO0201, BO0302) and operator training.(9 VAC 5-80-110)
15. **Fuel Burning Equipment Requirements – Boilers – Periodic Monitoring/Testing** – Compliance with the hourly Nitrogen Oxide emission limits in Condition 7 shall be demonstrated by performing a Method 7 stack test on boilers BO0101 and BO0201, while burning natural gas, at least once every permit term (5-year period).
(9 VAC 5-80-110)
16. **Fuel Burning Equipment Requirements – Boilers – Testing** - If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate methods in accordance with procedures approved by the DEQ.
(9 VAC 5-80-110)
17. **Fuel Burning Equipment Requirements – Boilers -Requirements by Reference (BO0302)** - Except where this permit is more restrictive than the applicable requirement, the No. 3 Package Boiler (BO0302) shall be operated in compliance

with the requirements of 40 CFR 60, Subpart Dc. 40 CFR 60.48c(g)(2) allows monthly tracking of amount of natural gas combusted. (See recordkeeping Condition 14.a)

(9 VAC 5-80-110, 40 CFR 60 Subpart Dc, and Condition 9 of the 2/14/2014 permit)

18. **Fuel Burning Equipment Requirements –Boilers - Requirements by Reference (BO0302)** - The No. 3 Package Boiler (BO0302) is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart DDDDD, in accordance with 40 CFR Parts 63.7480 through 63.7575 (including the Table(s) and Appendix(ices) referenced in Subpart DDDDD).
(9 VAC 5-80-110 and 40 CFR Part 63, Subpart DDDDD)
19. **Fuel Burning Equipment Requirements – Boilers – Requirements by Reference (BO0101, BO0201)**- The dual fuel boilers (BO0101, BO0201) are subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart JJJJJ.
(9 VAC 5-80-110 and 40 CFR Part 63, Subpart JJJJJ)

Fuel Burning Equipment Requirements – Expanded Tobacco Process - Thermal Expansion Furnaces
(FU0301, FU0401)

20. **Fuel Burning Equipment Requirements — Furnaces - Limitations - Fuel** - The furnaces (FU0301, FU0401) are designed to use natural gas. If it becomes necessary to change the type of fuel the Board must approve the change prior to its use.
(9 VAC 5-80-110)
21. **Fuel Burning Equipment Requirements – Furnaces - Limitations - Fuel Throughput** – The throughput of natural gas to the furnaces at the ET Process (FU0301, FU0401) shall not exceed 63 million cubic feet per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 7 of the 4/8/2016 permit)
22. **Fuel Burning Equipment Requirements –Furnaces - Visible Emissions** - Visible emissions from the furnaces at the ET Process (FU0301, FU0401) shall not exceed 20 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A), except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity.
(9 VAC 5-80-110)
23. **Fuel Burning Equipment Requirements – Furnaces - Monitoring** - Visible emissions checks shall be conducted for the furnaces at the ET Process (FU0301,

FU0401) semi-annually during periods of normal facility operation for a sufficient time interval to determine if there are any above-normal visible emissions. The permittee shall maintain a log noting: 1) all furnaces from which visible emissions occurred, and 2) whether the visible emissions were normal for the furnaces. If above-normal visible emissions are observed, a visible emissions evaluation (VEE) in accordance with 40 CFR Part 60, Appendix A, Method 9 shall be conducted. The VEE shall be conducted for a minimum period of six minutes. If any of the observations exceed the applicable opacity limit, the observation period shall continue until a total of sixty minutes of observation has been completed. A Method 9 evaluation shall not be required if the visible emissions condition is corrected in a timely manner such that no above normal visible emissions are present; the emissions unit is operating at normal operating conditions; and the cause and corrective measures taken are recorded.

(9 VAC 5-80-110)

24. **Fuel Burning Equipment Requirements – Furnaces - Limitations - On Site Records** - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to the monthly throughput of natural gas to the ET Process, including a summary sheet clearly indicating a running total throughput of natural gas combusted for each consecutive 12-month period, and the log of the results of semi-annual visible emissions observations.
(9 VAC 5-80-110 and Condition 33 of the 4/8/2016 permit)

Fuel Burning Equipment Requirements - Emergency Generators and Diesel Fire Pumps
(EG0102C, EG0801, PU0101C, PU0102C, EG0101, EG0301, EG0401, EG0501, EG0701, EG1001, EG1101)

25. **Fuel Burning Equipment Requirements – Emergency Generators and Fire Pumps - Emission Controls** – Emissions from the generators and fire pumps (EG0102C, EG0801, PU0101C, PU0102C, EG0101, EG0301, EG0401, EG0501, EG0701, EG1001, EG1101) shall be controlled by proper operation and maintenance of the units. The permittee shall follow manufacturer's recommendations at a minimum. The generator and fire pumps shall be provided with adequate access for inspection.
(9 VAC 5-80-110)
26. **Fuel Burning Equipment Requirements – Emergency Generators and Fire Pumps - Fuel** - The emergency generators (EG0102C, EG1001, EG1101), and diesel fire pumps (PU0101C, PU0102C) are designed to use #2 fuel oil. If it becomes necessary to change the type of fuel the Board must approve the change prior to its use.
(9 VAC 5-80-110)

27. **Fuel Burning Equipment Requirements – Emergency Generators and Fire Pumps - Fuel** - The emergency generators (EG0301, EG0401, EG0501, EG0701, EG0801) are designed to use propane. If it becomes necessary to change the type of fuel the Board must approve the change prior to its use.
(9 VAC 5-80-110)
28. **Fuel Burning Equipment Requirements – Emergency Generators and Fire Pumps - Operating Hours** - The emergency generators (EG0102C, EG0101, EG0301, EG0401, EG0501, EG0701, EG0801, EG1001, EG1101) and diesel fire pumps (PU0101C, PU0102C) shall each operate no more than 500 hours/yr, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-110)
29. **Fuel Burning Equipment Requirements – Emergency Generators and Fire Pumps - Federal Requirements** – The diesel emergency generators EG0102C, EG1001, and EG1101 are subject to the emission standards of 40 CFR 60, Subpart IIII (40 CFR 60.4205). As per the requirements of 40 CFR 60.4200(a)(2), 40 CFR 60.4202(a)(2), and 40 CFR 60.4205(b) the permittee shall obtain certification from the manufacturer as described in 40 CFR 89.112 and 40 CFR 89.113. As per the requirement of 40 CFR 60.4209, non-resettable hour meters shall be installed on these units. Compliance requirements as per 40 CFR 60.4211 shall be met.
(9 VAC 5-80-110)
30. **Fuel Burning Equipment Requirements – Emergency Generators and Fire Pumps - Federal Requirements** – The emergency generators and fire pumps (EG0102C, PU0101C, PU0102C, EG0101, EG0301, EG0401, EG0501, EG0701, EG0801, EG1001, EG1101) are subject to 40 CFR 63 Subpart ZZZZ. The requirements are as follows:

Unit	Size	Year	Citation	Requirement
PU0101C (diesel)	255 hp	1971	40CFR63.6590(a)(1)(ii) 40CFR63.6602 40CFR63.6604(b) 40CFR63.6625(e)(f)(h)(i) 40CFR63.6640	Existing CI stationary RICE \leq 500 HP located at a major* source of HAP emissions - comply with Table 2c, install non-resettable hour meter, follow work or management practices to show compliance with 2c.
PU0102C (diesel)	255 hp	1971	40CFR63.6590(a)(1)(ii) 40CFR63.6602 40CFR63.6604(b) 40CFR63.6625(e)(f)(h)(i) 40CFR63.6640	Existing CI stationary RICE \leq 500 HP located at a major* source of HAP emissions - comply with Table 2c, install non-resettable hour meter, follow work or management practices to show compliance with 2c.

Unit	Size	Year	Citation	Requirement
EG0101 (LPG)	60 kW (80 hp)	Prior to 1995	40CFR63.6602 40CFR63.6625(e)(f)(h)(j) 40CFR63.6605 40CFR63.6640	Existing SI stationary RICE \leq 500 HP located at a major* source of HAP emissions – comply with Table 2c, install non-resettable hour meter, follow work or management practices to show compliance with 2c.
EG0301 (LPG)	15 kW (20 hp)	2002	40CFR63.6602 40CFR63.6625(e)(f)(h)(j) 40CFR63.6605 40CFR63.6640	Existing SI stationary RICE \leq 500 HP located at a major* source of HAP emissions - comply with Table 2c, install non-resettable hour meter, follow work or management practices to show compliance with 2c.
EG0401 (LPG)	30 kW (40 hp)	2002	40CFR63.6602 40CFR63.6625(e)(f)(h)(j) 40CFR63.6605 40CFR63.6640	Existing SI stationary RICE \leq 500 HP located at a major* source of HAP emissions - comply with Table 2c, install non-resettable hour meter, follow work or management practices to show compliance with 2c.
EG0501 (LPG)	15 kW (20 hp)	2002	40CFR63.6602 40CFR63.6625(e)(f)(h)(j) 40CFR63.6605 40 CFR 63.6640	Existing SI stationary RICE \leq 500 HP located at a major* source of HAP emissions - comply with Table 2c, install non-resettable hour meter, follow work or management practices to show compliance with 2c.
EG0701 (LPG)	45 kW (75 hp)	2004	40CFR63.6602 40CFR63.6625(e)(f)(h)(j) 40CFR63.6605 40CFR63.6640	Existing SI stationary RICE \leq 500 HP located at a major* source of HAP emissions - comply with Table 2c, install non-resettable hour meter, follow work or management practices to show compliance with 2c.
EG0801 (NG)	22.8 hp	2006	40 CFR 63.6590(c)(6)	New emergency stationary RICE \leq 500 HP located at a major* source of HAP emissions – meet the requirements of 40 CFR 63, Subpart ZZZZ by meeting the requirements of 40 CFR 60 Subpart JJJJ (this unit is not directly subject to NSPS Subpart JJJJ as it was manufactured prior to January 1, 2009 and is less than 19kW)
EG0102C (diesel)	1141 hp	2007	40CFR63.6590(b)(1)(i) 40CFR63.6645(c)	New emergency stationary RICE with a site rating of more than 500 brake HP located at a major* source of HAP – Initial notification as per §63.6645 and no other 40 CFR 63, Subpart ZZZZ or Subpart A requirements are applicable as per 63.6590(b)(1)(i). Note: this unit is subject to 40 CFR 60, Subpart IIII. See condition 29.

Unit	Size	Year	Citation	Requirement
EG1001 (diesel)	762 hp	2012	40CFR63.6590(b)(1)(i) 40CFR63.6645(c)	New emergency stationary RICE with a site rating of more than 500 brake HP located at a major* source of HAP – Initial notification as per §63.6645 and no other 40 CFR 63, Subpart ZZZZ or Subpart A requirements are applicable as per 63.6590(b)(1)(i). Note: this unit is subject to 40 CFR 60, Subpart IIII. See condition 29.
EG1101 (diesel)	480 hp	2015	40CFR63.6590(c)(1)	New emergency stationary RICE, located at an area* source of HAP emissions – must comply with 40 CFR 63, Subpart ZZZZ by meeting the requirements of 40 CFR 60, Subpart IIII. See condition 29.

* This facility became an area source of HAP upon the removal of a coal boiler (permit rescinded on May 27, 2015). Units that were installed when the source was a major HAP source must comply with MACT rules for major sources, because of the “once in, always in” policy for MACT rules. Units installed after source became an area source are subject to area source requirements of the MACT.
(40 CFR 63.6585 and 9 VAC 5-80-110)

31. **Fuel Burning Equipment Requirements – Emergency Generators and Fire Pumps - Visible Emissions** - Visible emissions from the diesel emergency generators (EG0102C, EG1001, EG1101) shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity.
(9 VAC 5-80-110)
32. **Fuel Burning Equipment Requirements – Emergency Generators and Fire Pumps - Visible Emissions** - Visible emissions from the diesel fire pumps (PU0101C, PU0102C) shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-80-110)
33. **Fuel Burning Equipment Requirements – Emergency Generators and Fire Pumps - Monitoring** - Visible emissions checks shall be conducted for the diesel emergency generators (EG0102C, EG1001, EG1101) and diesel fire pumps (PU0101C, PU0102C) monthly during periods when the units are operated for emergency purposes or for routine testing for a sufficient time interval to determine if there are any above-normal visible emissions. The permittee shall maintain a log noting: 1) all associated emergency generators and fire pumps from which visible emissions occurred, and 2) whether the visible emissions were normal for these generators and fire pumps. If above-normal visible emissions are observed, a visible emissions evaluation (VEE) in accordance with 40 CFR Part 60, Appendix A, Method 9 shall be conducted. The VEE shall be conducted for a minimum period of six minutes. If any of the observations exceed the applicable opacity limit, the

observation period shall continue until a total of sixty minutes of observation has been completed. A Method 9 evaluation shall not be required if the visible emissions condition is corrected in a timely manner such that no above normal visible emissions are present; the emissions unit is operating at normal operating conditions or has been shut down; and the cause and corrective measures taken are recorded.
(9 VAC 5-80-110)

34. **Fuel Burning Equipment Requirements – Emergency Generators and Fire Pumps - Visible Emissions** - Visible emissions from the LPG emergency generators (EG0101, EG0301, EG0401, EG0501, EG0701, EG0801) shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity.
(9 VAC 5-80-110)
35. **Fuel Burning Equipment Requirements – Emergency Generators and Fire Pumps - Monitoring** - Visible emissions checks shall be conducted for the LPG emergency generators (EG0101, EG0301, EG0401, EG0501, EG0701, EG0801) semi-annually during periods when the units are operated for emergency purposes or for routine testing for a sufficient time interval to determine if there are any above-normal visible emissions. The permittee shall maintain a log noting: 1) all associated emission points from which visible emissions occurred, and 2) whether the visible emissions were normal for the LPG generators. If above-normal visible emissions are observed, a visible emissions evaluation (VEE) in accordance with 40 CFR Part 60, Appendix A, Method 9 shall be conducted. The VEE shall be conducted for a minimum period of six minutes. If any of the observations exceed the applicable opacity limit, the observation period shall continue until a total of sixty minutes of observation has been completed. A Method 9 evaluation shall not be required if the visible emissions condition is corrected in a timely manner such that no above normal visible emissions are present; the emissions unit is operating at normal operating conditions or has been shut down; and the cause and corrective measures taken are recorded.
(9 VAC 5-80-110)
36. **Fuel Burning Equipment Requirements – Emergency Generators and Fire Pumps - Monitoring** - Compliance with the hours of operation in condition 28 for the emergency generators (EG0102C, EG0101, EG0301, EG0401, EG0501, EG0701, EG0801, EG1001, EG1101) and the fire pumps (PU0101C, PU0102C) shall be to keep a log of operating hours on a monthly basis.
(9 VAC 5-80-110)
37. **Fuel Burning Equipment Requirements – Emergency Generators and Fire Pumps - Recordkeeping and Reporting** - The permittee shall maintain records of all emission data, fuel data, maintenance activity and operating parameters necessary to demonstrate compliance with the requirements of this permit for the emergency generators and fire pumps (EG0102C, EG0101, EG0301, EG0401, EG0501, EG0701,

EG0801, EG1001, EG1101, PU0101C, PU0102C). This includes records of the annual hours of operation on a monthly basis and the log of the results of the monthly visible emissions observations and any corrective action taken.
(9 VAC 5-80-110)

38. **Fuel Burning Equipment Requirements – Emergency Generators and Fire Pumps - Testing** - If testing of the emergency generators or fire pumps (EG0102C, EG0101, EG0301, EG0401, EG0501, EG0701, EG0801, EG1001, EG1101, PU0101C, PU0102C) is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate methods in accordance with procedures approved by the DEQ.
(9 VAC 5-80-110)

Process Equipment Requirements - Tobacco Processing

CS0101, CS0201, CS0301, CS1001, SP1301, SP1401, SP1501, SP1601, CS0901 (CS0902)*, CO0101, CO0601, CO0301, OC0301, CO0401, OC0401, PP0101, SM0402, SM0502, FU0301/EX0101, FU0401/EX0201, TP3301, CS0601, CS0701, DR0601, DR0701, DR0801, DR0901, FC0101, FC0201, FC0301, FC0401, DA0101, DA0201, DA0301, DA0401, CC0101, CC0301, CC0201, CC0401, TR0101, TR0102, TR0103, DC0102, FC0501, FC0502, FC0601, FC0602, FC0701, FC0702, FC0801, FC0802, TP0201, TP1101, TP1401, TP0801, TP1501, VS0101, TP3001, DC1001, CN0601, CN0602, CN0603, CN0701, MAHVSU, CN1001

*CS0902 will be replacing CS0901. At no time will these units be operated simultaneously.

39. **Process Equipment Requirements – Tobacco Processing - Limitations - Emission Controls** - Total Suspended Particulate and PM₁₀ emissions from the following equipment shall be controlled by rotoclone scrubbers:

Ref. No.	Description
CS0101, CS0201, CS0301, CS1001 CS0901 (CS0902)	Conditioning Cylinders Liquid Application and Conditioning Cylinder
FC0101, FC0201, FC0301, FC0401	Liquid Application Cylinders
CC0101, CC0301, CC0201, CC0401	Liquid Application Cylinders
CS0601, CS0701	Conditioning Cylinders
DR0601, DR0701, DR0801, DR0901	Steam Dryers
FC0501, FC0502, FC0601, FC0602, FC0701, FC0702, FC0801, FC0802	Liquid Application Cylinders

Each scrubber shall be provided with adequate access for inspection.
(9 VAC 5-80-110 and Condition 1 of the 4/8/2016 permit)

40. **Process Equipment Requirements – Tobacco Processing – Limitations - Emission Controls** - Total Suspended Particulate and PM₁₀ emissions from the following equipment shall be controlled by a fabric filter:

Ref. No.	Description
SP1301, SP1401, SP1501, SP1601	Pneumatic Separators

Ref. No.	Description
TP3301	Pneumatic Transport System
OC0301, OC0401, PP0101	Mechanical Transport System
SM0402, SM0502	Mechanical Separators
TP3001	Pneumatic Transport System
DC1001	Mechanical Transport System
VS0101	Mechanical Separating System
TP0201	Pneumatic Transport System
TP1401, TP0801, TP1501	Pneumatic Transport System
TP1101	Pneumatic Transport System
CN0601, CN0602, CN0603	Housekeeping Vacuum System
CN0701	Housekeeping Vacuum System
CN1001	Housekeeping Vacuum System
MAHVSU	Housekeeping Vacuum System

Each fabric filter shall be provided with adequate access for inspection.
(9 VAC 5-80-110 and Condition 2 of the 4/8/2016 permit)

41. **Process Equipment Requirements – Tobacco Processing – Limitations - Emission Controls** - Total Suspended Particulate and PM₁₀ emissions from the following equipment shall be controlled by a cartridge filter:

Ref. No.	Description
DC0102	Mechanical Transport System

The cartridge filter shall be provided with adequate access for inspection. It shall be equipped with a device to continuously measure the differential pressure drop through the cartridge filter. This device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times.
(9 VAC 5-80-110 and Condition 3 of the 4/8/2016 permit)

42. **Process Equipment Requirements – Tobacco Processing – Limitations - Emission Controls** - Total Suspended Particulate, PM₁₀ and VOC emissions from the following equipment shall be controlled by scrubbers:

Ref. No.	Description
CO0101, CO0601, CO0301, CO0401, OC0301, OC0401	Conditioning Chambers and Conveyors

Each scrubber shall be provided with adequate access for inspection.
(9 VAC 5-80-110 and Condition 4 of the 4/8/2016 permit)

43. **Process Equipment Requirements – Tobacco Processing – Limitations - Emission Controls** - VOC emissions from the following equipment shall be controlled by a Thermal Oxidizer:

Ref. No.	Description
DR0601, DR0701, DR0801, DR0901	Steam Dryers
FC0501, FC0502, FC0601, FC0602, FC0701, FC0702, FC0801, FC0802	Liquid Application Cylinders

The Thermal Oxidizer shall have a demonstrated Volatile Organic Compound destruction efficiency of at least 95% on a mass basis. The Thermal Oxidizer shall operate at an average temperature of 1370°F and a minimum retention time of 0.5 second. The Thermal Oxidizer temperatures shall be averaged on a three-hour rolling period. Any three-hour averages that are 50°F below the required 1370°F shall be recorded, for each day, for each line and an explanation provided for the reduction in temperature. Valid 3-hour averages shall consist of no less than 90% valid readings. This information shall be maintained at the facility for the most recent five years. Notification of a malfunction shall be given in accordance with the SAPCB Regulations. The Thermal Oxidizers shall be equipped with automatic control dampers which prevent the flow of VOC laden process exhaust air to the Thermal Oxidizer during process startup until the minimum temperature is attained. Additionally, the Thermal Oxidizers shall be interlocked with the process equipment and process exhaust fans such that during process startup tobacco shall not be processed until the Thermal Oxidizer minimum temperature is attained. The chamber temperature and automatic damper positions shall be continuously monitored and recorded. All continuous monitoring devices shall be maintained and calibrated in accordance with manufacturer's specifications. The exhaust systems to the Thermal Oxidizer shall be equipped with pressure gauges in the duct prior to the Thermal Oxidizer to insure that a negative pressure is being maintained in the exhaust system. The Thermal Oxidizer shall be provided with adequate access for inspection. (9 VAC 5-80-110, 10/14/97 RACT and Condition 5 of the 4/8/2016 permit)

44. **Process Equipment Requirements – Tobacco Processing – Limitations - Emission Controls** - Volatile Organic Compound emissions from all tobacco processing equipment other than DR0601, DR0701, DR0801, DR0901, FC0501, FC0502, FC0601, FC0602, FC0701, FC0702, FC0801, and FC0802 shall be controlled by using tobacco flavorings which have negligible volatility. (9 VAC 5-80-110, 10/14/97 RACT and Condition 6 of the 4/8/2016 permit)
45. **Process Equipment Requirements – Tobacco Processing – Limitations - Throughput** - The throughput of Bright Tobacco in the Pre-blend Area of the Manufacturing Center shall not exceed 30,442 tons per year (on a dry basis), calculated as the sum of each consecutive 12-month period. (9 VAC 5-80-110 and Condition 8 of the 4/8/2016 permit)
46. **Process Equipment Requirements – Tobacco Processing – Limitations - Throughput** - The throughput of Burley Tobacco in the Pre-blend Area of the Manufacturing Center shall not exceed 32,850 tons per year (on a dry basis), calculated as the sum of each consecutive 12-month period. (9 VAC 5-80-110 and Condition 9 of the 4/8/2016 permit)

47. **Process Equipment Requirements – Tobacco Processing – Limitations - Throughput** - The throughput of Expanded Tobacco in the Pre-blend Area of the Manufacturing Center shall not exceed 20,357 tons per year (on a dry basis), calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 10 of the 4/8/2016 permit)
48. **Process Equipment Requirements – Tobacco Processing – Limitations - Throughput** - The throughput of Oriental Tobacco in the Pre-blend Area of the Manufacturing Center shall not exceed 21,805 tons per year (on a dry basis), calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 11 of the 4/8/2016 permit)
49. **Process Equipment Requirements– Tobacco Processing – Limitations - Throughput** - The throughput of Scrap Tobacco in the Pre-blend Area of the Manufacturing Center shall not exceed 9,683 tons per year (on a dry basis), calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 12 of the 4/8/2016 permit)
50. **Process Equipment Requirements – Tobacco Processing – Limitations - Throughput** - The throughput of Sheet Tobacco in the Pre-blend Area of the Manufacturing Center shall not exceed 26,250 tons per year (on a dry basis), calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 13 of the 4/8/2016 permit)
51. **Process Equipment Requirements – Tobacco Processing – Limitations - Production** - The total production of Blended Tobacco at the Manufacturing Center shall not exceed 122,000 tons per year (on a dry basis), calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 14 of the 4/8/2016 permit)
52. **Process Equipment Requirements – Tobacco Processing – Limitations - Throughput** - The throughput of ethanol as Volatile Organic Compounds contained in the flavoring, casing, and spray materials used at the Manufacturing Center shall not exceed 175 tons per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 15 of the 4/8/2016 permit)
53. **Process Equipment Requirements – Tobacco Processing – Limitations - Throughput** - The throughput of dry material through TP1101 shall not exceed 3,756 tons per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 16 of the 4/8/2016 permit)

54. **Process Equipment Requirements – Tobacco Processing – Limitations - Throughput** - The throughput of dry material to DC0102 shall not exceed 4,000 tons per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 17 of the 4/8/2016 permit)
55. **Process Equipment Requirements – Tobacco Processing – Limitations- Throughput** - The throughput of liquid material through TR0101, TR0102, TR0103, MT0101, and MT0102 shall not exceed 1,500,000 gallons per year, calculated as the sum of each consecutive 12 month period.
(9 VAC 5-80-110 and Condition 18 of the 4/8/2016 permit)
56. **Process Equipment Requirements – Tobacco Processing – Limitations - Throughput** - The throughput of dry material to TP0801, TP1401, and TP1501 shall not exceed 474 tons per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 19 of the 4/8/2016 permit)
57. **Process Equipment Requirements – Tobacco Processing – Limitations - Throughput** - The throughput of dry material to TP3001, shall not exceed 31.4 TPB units per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 20 of the 4/8/2016 permit)
58. **Process Equipment Requirements – Tobacco Processing – Limitations - Throughput** - The throughput of dry material to DC1001, shall not exceed 37.7 TPB units per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 21 of the 4/8/2016 permit)
59. **Process Equipment Requirements – Tobacco Processing – Limitations - Throughput** - The throughput of dry material to CN0601, CN0602, and CN0603, shall not exceed 609.9 tons per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 22 of the 4/8/2016 permit)
60. **Process Equipment Requirements – Tobacco Processing – Limitations - Throughput** - The throughput of dry material to MAHVSU shall not exceed 87.2 tons per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 23 of the 4/8/2016 permit)
61. **Process Equipment Requirements – Tobacco Processing – Limitations - Throughput** - The throughput of dry material to CN0701 shall not exceed 122.1 tons per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 24 of the 4/8/2016 permit)

62. **Process Equipment Requirements – Tobacco Processing – Limitations - Throughput** - The throughput of dry material through CN1001 shall not exceed 28.5 tons per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 25 of the 4/8/2016 permit)
63. **Process Equipment Requirements – Tobacco Processing – Limitations - Throughput** - The throughput of material to VS0101 shall not exceed 5,000 tons per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 26 of the 4/8/2016 permit)
64. **Process Equipment Requirements – Tobacco Processing – Limitations - Emission Limits** - Emissions from the operation of the Expanded Tobacco process [CS0901 (CS0902), FU0301/EX0101, FU0401/ EX0201, CO0101, CO0601, CO0301, OC0301, CO0401, OC0401, PP0101, SM0402, SM0502] shall not exceed the limits specified below:

			Basis
Particulate Matter (filterable)	3.7 lbs/hr	5.3 tons/yr	(9 VAC 5-50-260)
PM ₁₀ (filterable)	0.9 lbs/hr	1.4 tons/yr	(9 VAC 5-50-260)
Nitrogen Oxides (As NO ₂)	1.3 lbs/hr	3.2 tons/yr	(9 VAC 5-50-260)
Carbon Monoxide	1.1 lbs/hr	2.7 tons/yr	(9 VAC 5-50-260)
Volatile Organic Compounds	35.8 lbs/hr	51.3 tons/yr	(9 VAC 5-50-260)

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers 21, 39, 40, 42, and 47.
(9 VAC 5-80-110 and Condition 27 of the 4/8/2016 permit)

65. **Process Equipment Requirements – Tobacco Processing – Limitations - Emissions** - Emissions from the operation of the permitted process equipment indicated below shall not exceed the limits specified:

Ref. No	Particulate (filterable)		PM ₁₀ (filterable)		Volatile Organic Compounds		Basis
	lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr	
DA0101, DA0201, DA0301, DA0401	6.8	29.2	1.6	7.2	31.6	138.4	(9 VAC 5-50-260)
FC0101, FC0201, FC0301, FC0401	1.2	4.0	0.4	2.0	8.4	35.2	(9 VAC 5-50-260)
CC0101, CC0301	1.2	5.3	0.3	1.3	4.1	18.2	(9 VAC 5-50-260)
CC0201, CC0401	1.2	5.3	0.3	1.3	8.6	38.1	(9 VAC 5-50-260)
CS0101, CS0201, CS0301, CS1001	0.5	0.4	0.1	0.1	7.5	5.4	(9 VAC 5-50-260)
SP1301, SP1401, SP1501, SP1601	0.5	0.8	0.1	0.2	9.0	10.6	(9 VAC 5-50-260)
TP3301	0.4	0.2	0.4	0.2	-	-	(9 VAC 5-50-260)

Ref. No	Particulate (filterable)		PM ₁₀ (filterable)		Volatile Organic Compounds		Basis
	lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr	
DR0601, DR0701, DR0801, DR0901	0.2	0.3	0.1	0.1	1.3	2.2	(9 VAC 5-50-260)
FC0501, FC0502, FC0601, FC0602, FC0701, FC0702, FC0801, FC0802	0.1	0.1	0.1	0.1	27.6	124.4	(9 VAC 5-50-260)
CS0601, CS0701	0.1	0.2	0.1	0.2	0.6	1.1	(9 VAC 5-50-260)
DC0102, TR0101, TR0102, TR0103, MT0101, MT0102	2.4	1.2	1.5	0.9	4.1	1.2	(9 VAC 5-50-260)
TP0801, TP1401, TP1501	0.8	3.6	0.8	3.6	-	-	(9 VAC 5-50-260)
CN0601, CN0602, CN0603	1.4	3.8	0.4	1.0	-	-	(9 VAC 5-50-260)
CN0701	0.4	0.7	0.1	0.5	-	-	(9 VAC 5-50-260)
TP3001	0.4	0.2	0.1	0.1	-	-	(9 VAC 5-50-260)
DC1001	1.5	0.2	0.4	0.1	-	-	(9 VAC 5-50-260)
VS0101	1.6	0.8	0.4	0.2	3.6	1.8	(9 VAC 5-50-260)
TP0201	3.0	12.9	0.7	3.2	-	-	(9 VAC 5-50-260)
TP1101	3.0	5.2	0.7	1.3	-	-	(9 VAC 5-50-260)
CN1001	0.2	0.6	0.1	0.2	-	-	(9 VAC 5-50-260)
MAHVSU	12.1	2.2	3.1	0.6	-	-	(9 VAC 5-50-260)

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers 39 through 63.
(9 VAC 5-80-110 and Condition 28 of the 4/8/2016 permit)

66. **Process Equipment Requirements – Tobacco Processing – Limitations - Emission Limits** - Fugitive emissions from the operation of the equipment associated with the April 8, 2016 permit shall not exceed the limits specified below:

	Basis
Volatile Organic Compounds	121.6 tons/yr (9 VAC 5-50-260)

(9 VAC 5-80-110 and Condition 29 of the 4/8/2016 permit)

67. **Process Equipment Requirements – Tobacco Processing – Limitations - Emission Limits** - Regardless of the emission limits imposed in conditions 64, 65, and 66 of this permit, emissions from the operation of the equipment associated with the April 8, 2016 permit shall not exceed the limits specified below:

	Basis
Particulate Matter (filterable)	36.8 tons/yr (9 VAC 5-50-260)
PM ₁₀ (filterable)	9.2 tons/yr (9 VAC 5-50-260)
Volatile Organic Compounds	229.0 tons/yr (9 VAC 5-50-260)

(9 VAC 5-80-110 and Condition 30 of the 4/8/2016 permit)

68. **Process Equipment Requirements – Tobacco Processing – Limitations - Visible Emissions** - Unless otherwise indicated, visible emissions from the rotoclone, scrubber, fabric filter, scrubber and thermal oxidizer stacks in the April 8, 2016 permit shall not exceed 5 percent opacity as determined by EPA Method 9 (reference: 40 CFR 60, Appendix A).
(9 VAC 5-80-110 and Condition 31 of the 4/8/2016 permit)
69. **Process Equipment Requirements – Tobacco Processing – Monitoring** - Each rotoclone scrubber required in Condition 39 of this permit shall be equipped with a flow meter to measure water flow to the scrubber.
(9 VAC 5-80-110 and Condition 1 of the 4/8/2016 permit)
70. **Process Equipment Requirements – Tobacco Processing – Monitoring** - Each fabric filter and cartridge filter required in Conditions 40 or 41 of this permit shall be equipped with a device to continuously measure the differential pressure drop through the fabric filter. Each device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times. To ensure good performance of the baghouses, the devices used to continuously measure the differential pressure drop across the baghouses shall be observed by the permittee with a frequency of not less than once per week when the associated process equipment is in operation. The permittee shall maintain a log of the observations from the devices.
(9 VAC 5-80-110 and Conditions 2 and 3 of the 4/8/2016 permit)
71. **Process Equipment Requirements – Tobacco Processing – Monitoring** - Each scrubber required in Condition 42 of this permit shall be equipped with a water flow meter and a device to continuously measure the differential pressure through the scrubber. To ensure good performance of the scrubber, the devices used to continuously measure the water flow and the differential pressure drop through the scrubber shall be observed by the permittee with a frequency of not less than once per week when the associated process equipment is in operation. The permittee shall maintain a log of the observations from the devices.
(9 VAC 5-80-110 and Condition 4 of the 4/8/2016 permit)
72. **Process Equipment Requirements – Tobacco Processing – Monitoring** - Visible emissions checks shall be conducted for each scrubber, fabric filter, and thermal oxidizer exhaust, at least monthly during periods of normal facility operation for a sufficient time interval to determine if there are any visible emissions. If visible emissions are observed, a visible emissions evaluation (VEE) in accordance with 40 CFR Part 60, Appendix A, Method 9 shall be conducted. The VEE shall be conducted for a minimum period of six minutes. If any of the observations exceed the applicable opacity limit, the observation period shall continue until a total of sixty minutes of observation has been completed. A Method 9 evaluation shall not be required if the visible emissions condition is corrected in a timely manner such that no visible

emissions are present; the emissions unit is operating at normal operating conditions; and the cause and corrective measures taken are recorded.
(9 VAC 5-80-110)

73. **Process Equipment Requirements – Tobacco Processing – Monitoring** - The chamber temperatures and automatic damper positions for the Thermal Oxidizer required in Condition 43 shall be continuously monitored and recorded hourly. All continuous monitoring devices shall be maintained and calibrated in accordance with manufacturer's specifications. The exhaust systems to the Thermal Oxidizer shall be equipped with pressure gauges in the duct prior to the Thermal Oxidizer to insure that a negative pressure is being maintained in the exhaust system.
(9 VAC 5-80-110, 10/14/1997 RACT and Condition 5 of the 4/8/2016 permit)
74. **Process Equipment Requirements – Tobacco Processing – Monitoring - Compliance Assurance Monitoring (CAM)** - The permittee shall monitor, operate, calibrate and maintain the fabric filters controlling the housekeeping vacuum units (CN0601, CN0602 and CN0603); the Mechanical Transport system (OC0301, OC0401, PP0101); and the Mechanical Separating system (VS0101) according to the following:

Monitoring, Frequency, Records	Performance Criteria	Indicator Range; Averaging Period
Continuous monitoring, recorded daily	Differential pressure drop across the fabric filters	CN0601 -Pressure drop between 0.2 and 4.0 inches of water column or as indicated in the most current CAM documentation maintained by the facility. CN0602, CN0603 – Pressure drop between 1.0 and 8.0 inches of water column or as indicated in the most current CAM documentation maintained by the facility. OC0301, OC0401, PP0101 – Pressure drop between 0.25 and 3.0 inches of water column or as indicated in the most current CAM documentation maintained by the facility. VS0101 – Pressure drop between 1.0 and 6.0 inches of water column or as indicated in the most current CAM documentation maintained by the facility.
Monthly observation, recorded monthly	Visible emissions	Presence of visible emissions

(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.6 (c))

75. **Process Equipment Requirements– Tobacco Processing – Monitoring - Compliance Assurance Monitoring (CAM)** - The permittee shall conduct the monitoring and fulfill the other obligations specified in 40 CFR 64.7 through 40 CFR 64.9.
(9 VAC 5-80-110 E and 40 CFR 64.6 (c))
76. **Process Equipment Requirements – Tobacco Processing – Monitoring - Compliance Assurance Monitoring (CAM)** - At all times, the permittee shall maintain the monitoring equipment, including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
(9 VAC 5-80-110 E and 40 CFR 64.7 (b))
77. **Process Equipment Requirements – Tobacco Processing – Monitoring - Compliance Assurance Monitoring (CAM)** - Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the fabric filters are operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of compliance assurance monitoring, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by inadequate maintenance or improper operation are not malfunctions.
(9 VAC 5-80-110 E and 40 CFR 64.7 (c))
78. **Process Equipment Requirements – Tobacco Processing – Monitoring - Compliance Assurance Monitoring (CAM)** - Upon detecting an excursion or exceedance, the permittee shall restore operation of the CAM affected units (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup and shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator, designated condition, or below the applicable emission limitation or standard, as applicable.
(9 VAC 5-80-110 E and 40 CFR 64.7 (d)(1))

79. **Process Equipment Requirements – Tobacco Processing – Monitoring - Compliance Assurance Monitoring (CAM)** - Determination that acceptable procedures were used in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
(9 VAC 5-80-110 E and 40 CFR 64.7(d) (2))
80. **Process Equipment Requirements – Tobacco Processing – Monitoring - Compliance Assurance Monitoring (CAM)** - If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the Director, Piedmont Regional Office and, if necessary, submit a proposed modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
(9 VAC 5-80-110 E and 40 CFR 64.7(e))
81. **Process Equipment Requirements – Tobacco Processing – Monitoring - Compliance Assurance Monitoring (CAM)** - If the number of exceedances or excursions exceeds 5 percent duration of the operating time for any CAM-affected unit for a semiannual reporting period, the permittee shall develop, implement and maintain a Quality Improvement Plan (QIP) in accordance with 40 CFR 64.8. If a QIP is required, the permittee shall have it available for inspection. The QIP initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the permittee shall modify the plan to include procedures for conducting one or more of the following, as appropriate:
- a. Improved preventative maintenance practices;
 - b. Process operation changes;
 - c. Appropriate improvements to control methods;
 - d. Other steps appropriate to correct control performance; and
 - e. More frequent or improved monitoring.
- (9 VAC 5-80-110 E and 40 CFR 64.8(a) and (b))
82. **Process Equipment Requirements – Tobacco Processing – Recordkeeping and Reporting** - The permittee shall maintain records of all emission data and operating

parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to:

- a. The monthly throughput of Bright Tobacco, Burley Tobacco, Expanded Tobacco, Oriental Tobacco, Scrap Tobacco, and Sheet Product processed in the Pre-blend Area of the permitted facility, including a summary sheet clearly indicating a running total of each type of tobacco throughput for each consecutive 12-month period.
- b. The monthly production of Blended Tobacco produced at the permitted facility, including a summary sheet clearly indicating a running total of tobacco production for each consecutive 12-month period.
- c. The monthly throughput of dry material through TP1101 and DC0102 at the permitted facility, including a summary sheet clearly indicating a running total of dry material throughput for each consecutive 12-month period.
- d. The monthly throughput of liquid material through TR0101, TR0102, TR0103, MT0101 and MT0102 at the permitted facility, including a summary sheet clearly indicating a running total of liquid material throughput for each consecutive 12-month period.
- e. The monthly throughput of dry material to TP1401, TP0801, TP1501 at the permitted facility, including a summary sheet clearly indicating a running total of dry material throughput for each consecutive 12-month period.
- f. The monthly throughput of material through VS0101 at the permitted facility, including a summary sheet clearly indicating a running total of dry material throughput for each consecutive 12-month period.
- g. The monthly throughput of dry material through the CN0601, CN0602, CN0603 at the permitted facility (which is based on the predicted weight of the material collected by the fabric filter), including a summary sheet clearly indicating a running total of dry material throughput for each consecutive 12-month period.
- h. The monthly throughput of dry material to the MAHVSU at the permitted facility, including a summary sheet clearly indicating a running total of dry material throughput for each consecutive 12-month period.
- i. The monthly throughput of dry material through CN0701 at the permitted facility, including a summary sheet clearly indicating a running total of dry material throughput for each consecutive 12-month period.

- j. The monthly throughput of dry material to CN1001, including a summary sheet clearly indicating a running total of dry material throughput for each consecutive 12-month period.
- k. Operating schedules for DR0601, DR0701, DR0801, DR0901, FC0501, FC0502, FC0601, FC0602, FC0701, FC0702, FC0801, FC0802 indicating all operating and downtime hours for each for each calendar day. Schedules shall be recorded weekly and shall be kept in close proximity to the Thermal Oxidizer chamber temperature and automatic damper position records.
- l. The monthly throughput of dry material to TP3001, including a summary sheet clearly indicating a running total of units throughput for each consecutive 12-month period.
- m. The monthly throughput of dry material to DC1001, including a summary sheet clearly indicating a running total of units throughput for each consecutive 12-month period.
- n. Monthly calculations showing emissions of particulate matter (PM), PM₁₀ and volatile organic compounds (VOC) for the tobacco processing operation, including a summary sheet clearly indicating a running total of PM, PM₁₀ and VOC emissions for each consecutive 12-month period.
- o. Results of the weekly log of observations on the devices used to measure the pressure drop across the baghouses and scrubbers and the water flow through the scrubbers.
- p. Results of Compliance Assurance Monitoring for the associated baghouses.
- q. Monthly log of scrubber and fabric filter visible emissions observations.
- r. Thermal Oxidizer chamber temperature and automatic damper position records.
- s. A maintenance schedule for all air pollution control equipment
- t. Scheduled and unscheduled maintenance records for all air pollution control equipment.
- u. Inventory of spare parts to minimize duration of air pollution control equipment breakdowns.
- v. Written operating procedures for all air pollution control equipment.
- w. Operator training records for air pollution control equipment.

- x. Stack test reports and results of visible emissions observations, including any actions taken.

(9 VAC 5-80-110 and Condition 33 of the 4/8/2016 permit)

- 83. **Process Equipment Requirements – Tobacco Processing – Recordkeeping and Reporting** - These records shall be available on site for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-80-110 and Condition 33 of the 4/8/2016 permit)

- 84. **Process Equipment Requirements – Tobacco Processing – Testing** - If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate methods in accordance with procedures approved by the DEQ

(9 VAC 5-80-110)

Process Equipment Requirements – Commercial process at the Semiworks (R&D) Facility
PC0101SW, CS0201SW, SP0101SW, OD0101SW, FC0101SW, DA0101SW, CC0101SW, CC0201SW, CS0301SW, DR0101SW, FC0201SW, FC0202SW, TP0101SW, TP0201SW

- 85. **Process Equipment Requirements – Semiworks - Emission Controls – Particulate Matter emissions** from SP0101SW, OD0101SW and TP0101SW shall be controlled by baghouses (BH0101SW and BH0301SW). The baghouses shall be provided with adequate access for inspection and shall be in operation when SP0101SW, OD0101SW or TP0101SW are operating.

(9 VAC 5-80-110 and Condition 2 of the 1/27/2011 permit)

- 86. **Process Equipment Requirements – Semiworks - Emission Controls – Particulate Matter emissions** from TP0201SW shall be controlled by portable dust filters (BH0401SW through BH0408SW). The portable dust filters shall be provided with adequate access for inspection and shall be in operation when TP0201SW is operating.

(9 VAC 5-80-110 and Condition 3 of the 1/27/2011 permit)

- 87. **Process Equipment Requirements – Semiworks - Monitoring Devices** – Each of the baghouses shall be equipped with a device to continuously measure the differential pressure drop across the baghouse. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the baghouses are operating.

(9 VAC 5-80-110 and Condition 4 of the 1/27/2011 permit)

- 88. **Process Equipment Requirements – Semiworks - Monitoring Device Observation** – To ensure good performance of the baghouses, the devices used to continuously measure the differential pressure drop across the baghouses shall be observed by the permittee with a frequency of not less than once per week when the

associated process equipment is in operation. The permittee shall maintain a log of the observations from the devices.

(9 VAC 5-80-110 and Condition 5 of the 1/27/2011 permit)

89. **Process Equipment Requirements – Semiworks - Emission Controls** – Particulate Matter emissions from CS0201SW, FC0101SW, DA0101SW, CC0101SW, CC0201SW, CS0301SW, DR0101SW, FC0201SW and FC0202SW shall be controlled by a scrubber (SC0101SW). The scrubber shall be provided with adequate access for inspection and shall be in operation when CS0201SW, FC0101SW, DA0101SW, CC0101SW, CC0201SW, CS0301SW, DR0101SW, FC0201SW and FC0202SW are operating.
(9 VAC 5-80-110 and Condition 6 of the 1/27/2011 permit)
90. **Process Equipment Requirements – Semiworks - Monitoring Devices** - The scrubber (SC0101SW) shall be equipped with devices to continuously measure the water flow rate and differential pressure drop. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the scrubber is operating.
(9 VAC 5-80-110 and Condition 7 of the 1/27/2011 permit)
91. **Process Equipment Requirements – Semiworks - Monitoring Device Observation** – To ensure good performance of the scrubber (SC0101SW), the devices used to continuously measure the water flow rate and differential pressure drop shall be observed by the permittee with a frequency of not less than once per week when the associated process equipment is in operation. The permittee shall keep a log of the observations from the devices.
(9 VAC 5-80-110 and Condition 8 of the 1/27/2011 permit)
92. **Process Equipment Requirements – Semiworks - VOC Work Practice Standards** – At all times the disposal of volatile organic compounds shall be accomplished by taking measures, to the extent practicable, consistent with air pollution control practices for minimizing emissions. Volatile organic compounds shall not be intentionally spilled, discarded in sewers which are not connected to a treatment plant, or stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution practices for minimizing emissions.
(9 VAC 5-80-110 and Condition 9 of the 1/27/2011 permit)
93. **Process Equipment Requirements – Semiworks - Processing** - The tobacco processing equipment shall process no more than 562,500 SWC units per year of total tobacco and 112,500 SWC units per year of Burley tobacco for commercial production, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by

adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

(9 VAC 5-80-110 and Condition 10 of the 1/27/2011 permit)

94. **Process Equipment Requirements – Semiworks - Throughput** - The throughput of ethanol in flavoring to the tobacco processing equipment shall not exceed 6.4 tons per year for commercial production, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

(9 VAC 5-80-110 and Condition 11 of the 1/27/2011 permit)

95. **Process Equipment Requirements – Semiworks - Process Emission Limits** - Emissions from the commercial operation of the tobacco processing equipment shall not exceed the limits specified below:

			Basis
Particulate Matter (PM)	0.6 lbs/hr	0.5 tons/yr	(9 VAC 5-50-260)
PM ₁₀	0.1 lbs/hr	0.1 tons/yr	(9 VAC 5-50-260)
Volatile Organic Compounds	14.5 lbs/hr	10.0 tons/yr	(9 VAC 5-50-260)

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Conditions 85, 86, 89, 93, and 94.

(9 VAC 5-80-110 and Condition 12 of the 1/27/2011 permit)

96. **Process Equipment Requirements – Semiworks - Visible Emission Limit** - Visible emissions from the baghouses (BH0101SW and BH0301SW), dust filters (BH0401SW through BH0408SW) and scrubber (SC0101SW) stacks shall not exceed 5 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A).

(9 VAC 5-80-110 and Condition 13 of the 1/27/2011 permit)

97. **Process Equipment Requirements – Semiworks - Monitoring** - Visible emissions checks shall be conducted for control devices BH0101SW, BH0301SW, BH0401SW through BH0408SW, and SC0101SW at least quarterly during periods of normal facility operation for a sufficient time interval to determine if there are any above normal visible emissions. If above normal visible emissions are observed, a visible emissions evaluation (VEE) in accordance with 40 CFR Part 60, Appendix A, Method 9 shall be conducted. The VEE shall be conducted for a minimum period of six minutes. If any of the observations exceed the applicable opacity limit (Condition 96), the observation period shall continue until a total of sixty minutes of observation has been completed. A Method 9 evaluation shall not be required if the visible

emissions condition is corrected in a timely manner such that no above normal visible emissions are present; the emissions unit is operating at normal operating conditions; and the cause and corrective measures taken are recorded.
(9 VAC 5 80-110)

98. **Process Equipment Requirements – Semiworks - On Site Records** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Piedmont Regional Office. These records shall include, but are not limited to:
- a. Annual processing of total tobacco and Burley tobacco, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
 - b. Annual throughput of ethanol in flavoring, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
 - c. Operation and control device monitoring records for the scrubber and baghouses as required in Conditions 88 and 91.
 - d. Scheduled and unscheduled maintenance and operator training.
 - e. Records of visible emissions observations.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.
(9 VAC 5-80-110 and Condition 14 of the 1/27/2011 permit)

99. **Process Equipment Requirements – Semiworks - Emissions Testing** - The tobacco processing equipment shall be constructed so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods.
(9 VAC 5-80-110 and Condition 15 of the 1/27/2011 permit)

Insignificant Emission Units

100. **Insignificant Emission Units** - The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Regulatory Basis	Pollutant Emitted	Rated Capacity
CF0401 to CF0404	Mechanical Separators	9 VAC 5-80-720 B	VOC, PM, PM ₁₀	
VC0101, VC0102		9 VAC 5-80-720 B	PM ₁₀	
CF0101 to CF0105, CF0201 to CF0205, CF0301 to CF0303	Cutters	9 VAC 5-80-720 B	PM, PM ₁₀	
CO0501	Conveyors	9 VAC 5-80-720 B	VOC, PM, PM ₁₀	
EH0201	Paint Spray Booth	9 VAC 5-80-720 B	VOC, PM, PM ₁₀	
EV0101	Electric (Parts Rinse Water) Concentrator	9 VAC 5-80-720 B	VOC	
HX1001	Electric (Parts Glue Removal) Dryer	9 VAC 5-80-720 B	PM, PM ₁₀	
IM0101, IM0102, IM0103, IM0104	Treatment Chambers	9 VAC 5-80-720 B	VOC, PM, PM ₁₀	
IM0201, IM0202 IM0301, IM0303		9 VAC 5-80-720 B	VOC, PM, PM ₁₀	
MT0101S, MT0102S	Spray Flavor Blend Tank	9 VAC 5-80-720 B	VOC	
SI0101, SI0102, SI0201, SI0202	Total Blend Silos	9 VAC 5-80-720 B	PM, PM ₁₀	
SI0401, SI0501, SI0601	Tobacco Silos	9 VAC 5-80-720 B	PM, PM ₁₀	
TK0101	Underground Alcohol Storage Tank	9 VAC 5-80-720 B	VOC	20,000 gal.
TK0102	Underground Alcohol Storage Tank	9 VAC 5-80-720 B	VOC	20,000 gal.
TK0301C	No.2 Fuel Oil Storage Tank (Central Plant)	9 VAC 5-80-720 B	VOC	148,000 gal.
TK0302C	No.2 Fuel Oil Storage Tank (Central Plant)	9 VAC 5-80-720 B	VOC	148,000 gal.
TK0303S, TK0312S, TK0313S, TK0314S, TK0315S, TK0316S	Spray Flavor Application Tanks	9 VAC 5-80-720 B	VOC	
TK1601C	Burley Casing Blend Tank	9 VAC 5-80-720 B	VOC	
TK1701C, TK1702C, TK1703C	Burley Casing Application Tanks	9 VAC 5-80-720 B	VOC	
TP3101	Pneumatic Transport System	9 VAC 5-80-720 B	PM, PM ₁₀	
TP3201	Pneumatic Transport System	9 VAC 5-80-720 B	PM, PM ₁₀	
Various	Shop Parts Washers	9 VAC 5-80-720 B	VOC	
Various	Parts Sandblasters	9 VAC 5-80-720 B	PM, PM ₁₀	
Various	Flavor Tanks	9 VAC 5-80-720 B	VOC	
Various	Glue (Adhesive), and Plasticizer Tanks	9 VAC 5-80-720 B	VOC	
Various	Hydraulic Oil Tanks	9 VAC 5-80-720 B	VOC	
Various	Diesel Day Tanks	9 VAC 5-80-720 B	VOC	
Various	Various Foil Packaging	9 VAC 5-80-720 B	VOC	
SM0601	Mechanical Separating System	9 VAC 5-80-720 B	PM, PM ₁₀	

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Permit Shield and Inapplicable Requirements

101. **Permit Shield and Inapplicable Requirements** - Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been identified as being not applicable to specific units at this permitted facility:

Citation	Title of Citation	Description of Applicability
40 CFR 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.	Generators EG0101, EG0301, EG0401, EG0501, EG0701, and EG0801 were manufactured prior to January 1, 2009.
40 CFR 60 Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	PU0101C and PU0102C were manufactured prior to July 1, 2006.
40 CFR 60 Subpart D	<ul style="list-style-type: none"> Standards of Performance for Fossil-fuel Fired Steam Generators 	<ul style="list-style-type: none"> All the boilers are less than 250 MMBtu/hr capacity.
40 CFR 60 Subpart Da	<ul style="list-style-type: none"> Standards of Performance for Electric Utility Steam Generating Units 	<ul style="list-style-type: none"> All boilers are less than 250 MMBtu/hr capacity and are not electric utility steam generating units.
40 CFR 60 Subpart Db	<ul style="list-style-type: none"> Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units 	<ul style="list-style-type: none"> BO0101 and BO0201 were constructed before June 19, 1984. BO0302 is less than 100 MMBtu/hr capacity.
40 CFR 60 Subpart Dc	<ul style="list-style-type: none"> Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units 	<ul style="list-style-type: none"> BO0101 and BO0201 were constructed before June 9, 1989 and are greater than 100 MMBtu/hr capacity.
9 VAC 5-40-880 (Rule 4-8)	Emission Standards for Fuel Burning Equipment	All the boilers were constructed after March 17, 1972 and so are not existing sources. Internal combustion engines are not considered fuel-burning equipment and so the generators are not subject to this Rule.

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.
(9 VAC 5-80-140)

General Conditions

102. **General Conditions - Federal Enforceability-** All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.
(9 VAC 5-80-110 N)
103. **General Conditions - Permit Expiration** - This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.
- a. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.
 - b. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.
 - c. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.
 - d. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.
 - e. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.
(9VAC 5-80-80 B, C and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)
104. **General Conditions - Recordkeeping and Reporting** - All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:

- a. The date, place as defined in the permit, and time of sampling or measurements.
- b. The dates analyses were performed.
- c. The company or entity that performed the analyses.
- d. The analytical techniques or methods used.
- e. The results of such analyses.
- f. The operating conditions existing at the time of sampling or measurement.
(9 VAC 5-80-110 F)

105. **General Conditions - Recordkeeping and Reporting** - Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
(9 VAC 5-80-110 F)

106. **General Conditions - Recordkeeping and Reporting** - The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than March 1 and September 1 of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.
- b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:
 - i) Exceedance of emissions limitations or operational restrictions;
 - ii) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,
 - iii) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.
- c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that “no deviations from permit requirements occurred during this semi-annual reporting period.”
(9 VAC 5-80-110 F)

107. **General Conditions - Annual Compliance Certification-** Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:
- a. The time period included in the certification. The time period to be addressed is January 1 to December 31.
 - b. The identification of each term or condition of the permit that is the basis of the certification.
 - c. The compliance status.
 - d. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.
 - e. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.
 - f. Such other facts as the permit may require to determine the compliance status of the source.
 - g. One copy of the annual compliance certification shall be submitted to EPA in electronic format only. The certification document should be sent to the following electronic mailing address:

R3_APD_Permit@EPA.gov

(9 VAC 5-80-110 K.5)

108. **General Conditions - Permit Deviation Reporting-** The permittee shall notify the Director, Piedmont Regional Office, within four daytime business hours of any discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition 106 of this permit.
(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

109. **General Conditions - Failure/Malfunction Reporting** - In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Director, Piedmont Region by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Piedmont Region.
(9 VAC 5-20-180 C)
110. **General Conditions – Severability** - The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.
(9 VAC 5-80-110 G.1)
111. **General Conditions - Duty to Comply** - The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.
(9 VAC 5-80-110 G.2)
112. **General Conditions - Need to Halt or Reduce Activity not a Defense** - It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
(9 VAC 5-80-110 G.3)
113. **General Conditions - Permit Modification** - A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1790, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.
(9 VAC 5-80-190 and 9 VAC 5-80-260)
114. **General Conditions - Property Rights** - The permit does not convey any property rights of any sort, or any exclusive privilege.
(9 VAC 5-80-110 G.5)

115. **General Conditions - Duty to Submit Information** - The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.
(9 VAC 5-80-110 G.6)
116. **General Conditions - Duty to Submit Information** - Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.
(9 VAC 5-80-110 K.1)
117. **General Conditions - Duty to Pay Permit Fees** - The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by April 15 of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department.
(9 VAC 5-80-110 H and 9 VAC 5-80-340 C)
118. **General Conditions - Fugitive Dust Emission Standards** - During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:
- a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
 - b. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
 - c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations;
 - d. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,

- e. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.
(9 VAC 5-40-90 and 9 VAC 5-50-90)
- 119. **General Conditions - Startup, Shutdown, and Malfunction** - At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
(9 VAC 5-50-20)
- 120. **General Conditions - Alternative Operating Scenarios** - Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1.
(9 VAC 5-80-110 J)
- 121. **General Conditions - Inspection and Entry Requirements** - The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:
 - a. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
 - d. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.
(9 VAC 5-80-110 K.2)
- 122. **General Conditions - Reopening For Cause** - The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no

later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

- a. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- b. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- c. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

123. **General Conditions - Permit Availability** - Within five days after receipt of the issued permit, the permittee shall maintain a copy of the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.

(9 VAC 5-80-150 E)

124. **General Conditions - Transfer of Permits** - No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.

- a. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.
- b. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.

(9 VAC 5-80-160)

125. **General Conditions - Malfunction as an Affirmative Defense** - A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the conditions of paragraph a below are met.

- a. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:

- i) A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
 - ii) The permitted facility was at the time being properly operated.
 - iii) During the period of malfunction, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit.
 - iv) The permittee notified the board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F 2 b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.
- b. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.
- c. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any requirement applicable to the source.
(9 VAC 5-80-250)
126. **General Conditions - Permit Revocation or Termination for Cause** - A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe, any permit for any of the grounds for revocation or termination or for any other violations of these regulations.
(9 VAC 5-80-190 C and 9 VAC 5-80-260)
127. **General Conditions - Duty to Supplement or Correct Application** - Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.
(9 VAC 5-80-80 E)

128. **General Conditions - Stratospheric Ozone Protection** - If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.
(40 CFR Part 82, Subparts A-F)
129. **General Conditions - Emissions Trading** - Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:
- a. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.
 - b. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
 - c. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.
(9 VAC 5-80-110 I)

State-Only Enforceable Requirements

130. **State-Only Enforceable Requirements** - The following terms and conditions are not required under the federal Clean Air Act or under any of its applicable federal requirements, and are not subject to the requirements of 9 VAC 5-80-290 concerning review of proposed permits by EPA and draft permits by affected states.
- a. Odor - None.
 - b. Emission Standard for Toxic Pollutants - The facility shall operate in compliance with 9 VAC 5-60, Article 4 and Article 5. No changes in the facility that increase emission of any non-criteria pollutant or cause the emission of additional non-criteria pollutants shall be made without the prior written approval of the Board.
(9 VAC 5-80-110)
 - c. Other - The TSP limits were changed to PM (TSP) so as to reflect the Virginia PSD regulation definition of Particulate Matter as PM (TSP) for the significance levels used in PSD determinations and in other parts of the state regulations. PM (TSP) includes filterable PM₁₀ in all the limitations in the NSR permit and Title V permit.
(9 VAC 5-80-110 N and 9 VAC 5-80-300)